WILMERHALE

March 16, 2022

Christopher R. Noyes

VIA ECF

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The Honorable Loretta A. Preska

United States District Court Southern District of New York United States Courthouse 500 Pearl Street, Room 2220 New York, NY 10007-1312

Re: Montres Breguet S.A. et al. v. Samsung Electronics Co. Ltd. et al., Case No. 1:19-cv-01708-LAP

Dear Judge Preska:

The parties write jointly to request an adjournment of the conference scheduled for March 18, 2022 at 11:00 AM to at least April 15, 2022 or at a time thereafter acceptable to the Court.

The discovery issues raised by Swatch Group in its March 2, 2022 letter (Dkt. 92) are fully briefed. Pursuant to the Court's Order of March 9, 2022, the parties are scheduled to meet and confer on Thursday, March 17, 2022, to discuss discovery issues raised by Samsung on March 4, 2022. In an effort to narrow the issues for the Court's consideration, and if necessary, to have the Court consider any remaining disputes in a single hearing, the parties propose an adjournment of at least four weeks. This adjournment will also allow counsel to appropriately confer on any outstanding issues with their clients, who have limited availability because they are currently engaged in a trial on related issues in the United Kingdom. That trial starts on March 18, 2022 and is scheduled to last at least through March 25. The parties propose sending the Court a joint letter identifying any outstanding discovery disputes one week before the adjourned hearing date.

This is the parties' second request for an extension. There are no case deadlines that will be affected other than the March 18, 2022 conference.

Sincerely,

/s/ Christopher R. Noyes Christopher R. Noyes

cc: All Counsel of Record (via ECF)

SO ORDERED

LORETTA A. PRESKA

UNITED STATES DISTRICT JUDGE

3/17/22